

1 Nicole G. True, Bar No. 12879
2 NTrue@lewisroca.com
3 LEWIS ROCA ROTHGERBER CHRISTIE LLP
4 201 East Washington Street, Suite 1200
Phoenix, AZ 85004
Tel: 602.262.5311
Fax: 602.262.5747

5 Brian D. Blakley, Bar No. 13074
6 BBlakley@lewisroca.com
7 LEWIS ROCA ROTHGERBER CHRISTIE LLP
8 3993 Howard Hughes Parkway, Suite 600
Las Vegas, NV 89169
Tel: 702.949.8200
Fax: 702.949.8398

9 | Attorneys for Transamerica

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

12 SARA FOLEY, in her capacity as
13 Administrator of the Estate of NOEL
MARTINEZ,

1 Plaintiff,

15 || V.

16 WELLS FARGO BANK, N.A.;
TRANSAMERICA, et al.,

Defendants.

CASE NUMBER: 2:21-cv-01538-RFB-EJY

**STIPULATION FOR EXTENSION OF
TIME FOR TRANSAMERICA TO
RESPOND TO AMENDED COMPLAINT**

19 Plaintiff Sara Foley and Defendant Transamerica stipulate and agree that Transamerica
20 may have an extension of time to file its response to the Amended Complaint. Transamerica
21 requested and Plaintiff agreed to this extension so as to allow Transamerica's counsel to collect
22 and review the documentation necessary to respond to the Amended Complaint. With the
23 requested extension, Transamerica's response will be due December 15, 2021.

24 DATED this 29th day of November, 2021.

25 | ././.

26 | ././.

27 | ./.

28 | ./.

116114970.1

1 FORTRESS LAW AND REALTY

2 By: /s/

3 Keith Routsong
keith@fortresslawandrealty.com

4 10000 West Charleston Boulevard, Suite 130
Las Vegas, NV 89135

5 BLACKROCK LEGAL, LLC

6 By: /s/ Thomas R. Grover (with permission)

7 Michael A. Olsen
mike@blackrocklawyers.com

8 Thomas R. Grover
tom@blackrocklawyers.com

9 10155 West Twain Avenue, Suite 100

10 Las Vegas, NV 89147

11 Tel: 702.855.56.58

12 Fax: 702.869.8243

13 Attorneys for Plaintiff

LEWIS ROCA ROTHGERBER CHRISTIE
LLP

14 By: /s/ Nicole G. True

15 Nicole G. True, Bar No. 12879

16 NTrue@lewisroca.com

17 Brian D. Blakley, Bar No. 13074

18 BBBlakley@lewisroca.com

19 201 East Washington Street, Suite 1200

20 Phoenix, AZ 85004

21 Tel.: 602.262.5311

22 Fax: 602.262.5747

23 Attorneys for Transamerica

24 **IT IS SO ORDERED:**

25 
26 UNITED STATES MAGISTRATE JUDGE

27 DATED: November 29, 2021

28 201 East Washington Street, Suite 1200
Phoenix, AZ 85004

LEWIS ROCA